

HELEN F. DALTON & ASSOCIATES, P.C.
ATTORNEYS AT LAW



80-02 Kew Gardens Road, Suite 601, Kew Gardens, NY 11415

Application granted. The time for Plaintiff to file his response to both pre-motion letters and Rule 56.1 Statements is extended to August 18, 2025.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
August 12, 2025

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11, 2025

Via ECF:

The Honorable Philip M. Halpern, U.S.
United States District Court
Southern District of New York
Federal Building and Courthouse
300 Quarropas Street, Room 530
White Plains, New York 10601

Re: Ortega et al v. Healthy Choice Markets IV, LLC et al.
Civil Docket No.: 7:24-cv-05682-PMH

Dear Judge Halpern:

We represent the Plaintiff in this FLSA action, and we respectfully submit this letter motion to respectfully request a brief extension to file Plaintiff's Responses to Defendants' Healthy Choice Markets IV, LLC request for pre-motion conference and Rule 56.1 Statement.

The reason for this request is that Plaintiff received a Rule 68 Offer of Judgment from Defendant Green's Natural Foods, Inc. Plaintiff will be filing an acceptance of Defendant Green Natural Foods Rule 68 Offer of Judgment on a separate cover. Additionally, today, the undersigned conferred with counsel for Healthy Choice Markets IV, LLC about possible resolution. In light of this, Plaintiff respectfully requests a brief one (1) extension, or by August 18, 2025, to file a response to Defendants' Healthy Choice Markets IV, LLC request for pre-motion conference and Rule 56.1 Statement while the parties continue to discuss possible resolution.

This is the second request for an extension of this deadline, and this will not affect any other deadlines.

We thank Your Honor for his kind consideration on this matter, and we remain available to provide any additional necessary information.

Respectfully submitted,

/s/Katelyn Schillaci
Katelyn M. Schillaci, Esq.

CC: counsel for the defendants via ECF.